

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Laura E. Hansen	:	Chapter 13
	Thomas R. Hansen	:	
	Debtors	:	
JPMorgan Chase Bank, NA		:	
Movant		:	Bankruptcy Case Number
		:	13-20525 AMC
		:	
v.		:	
		:	
Laura E. Hansen and Thomas R. Hansen		:	
		:	
Respondent/Debtors		:	
		:	
And		:	
		:	
William C. Miller, Esquire		:	
Trustee		:	

**Debtor's Response to the Motion of JPMorgan Chase Bank NA
for Relief from the Automatic Stay**

Debtors, **Laura E. Hansen and Thomas R. Hansen**, by and through their counsel,
MICHAEL SCHWARTZ, ESQUIRE, hereby file this response to the Motion for Relief of
JPMorgan Chase Bank and in support thereof avers as follows:

1. ADMITTED.
2. ADMITTED.
3. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.
4. ADMITTED.

5. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

6. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

7. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

8. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

9. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

10. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

11. DENIED. Answering Debtor denies the allegations contained in this paragraph as conclusions of law to which no response is required. Strict proof thereof is demanded at time of hearing if deemed relevant.

WHEREFORE, Debtors, **Laura and Thomas Hansen**, requests this Honorable Court deny the motion of JPMorgan Chase Bank, as Trustee for relief from automatic stay and to

declare the automatic stay is still in effect.

Respectfully Submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Counsel for Debtors